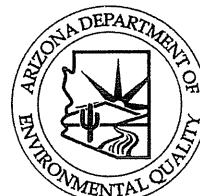




Janice K. Brewer  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007  
(602) 771-2300 • [www.azdeq.gov](http://www.azdeq.gov)



Benjamin H. Grumbles  
Director

March 25, 2010

AZPDES Permit Holder

Re: **DMR-QA Analysis**

Dear AZPDES Permittee,

All major and most minor<sup>1</sup> facilities permitted under the National Pollutant Discharge Elimination System (NPDES) program, including the AZPDES program, must participate in the Discharge Monitoring Report - Quality Assurance (DMR-QA) Study each year. The DMR-QA Study evaluates the analytical and reporting ability of the laboratories that you use to routinely perform the inorganic chemistry, microbiology, and Whole Effluent Toxicity analyses required by your AZPDES permit. As the permit holder, you have the ultimate responsibility for the quality of the data reported for compliance with your permit and are required to participate in the annual DMR-QA study when requested. EPA requires participation in this program, including all necessary and appropriate analyses, reporting, and record retention, under the authority of Section 308(a) of the Clean Water Act. Participation in the DMR-QA Study ensures that proper procedures and methods are being followed and thus valid results can be produced.

For a number of permittees who perform the on-site "15-minute tests" such as pH, total residual chlorine, temperature, and dissolved oxygen, the only proficiency testing required is through the DMR-QA program, as the facilities are not certified by Arizona Department of Health Services (ADHS) Lab Licensure. It has recently come to our attention that several permittees have had multiple DMR-QA failures for these tests, thus calling into question the validity of the data being submitted on their Discharge Monitoring Reports (DMRs).

Quality Assurance requirements for AZPDES include writing and implementing a Quality Assurance Manual, maintaining Standard Operating Procedures for all analyses performed in house, and ensuring that all sample analyses are performed according to the proper methods. This includes the "15 minute" tests. In addition, eligibility for licensure exemption for the "15-minute" tests mandates that an ADHS-certifiable method be followed. If there is a deviation from the method, these tests could be subject to licensing requirements and would no longer be exempt. Ultimately, the goal is to obtain valid data. Passing the DMR-QA proficiency tests is required, and repeated failures will require substantive corrective action and may lead to possible compliance action.

Northern Regional Office  
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001  
(928) 779-0313

Southern Regional Office  
400 West Congress Street • Suite 433 • Tucson, AZ 85701  
(520) 628-6733

If you have any questions, please feel free to contact me at [hoskin.julie@azdeq.gov](mailto:hoskin.julie@azdeq.gov) or by phone at (602) 771-4866. Thank you for doing your part to protect public health and our environment.

Sincerely,



Julie Hoskin  
QA/QC and Laboratory Services Manager

---

<sup>1</sup> Under the NPDES program, minor facilities are wastewater treatment plants that discharge less than 1.0 million gallons per day or are otherwise designated as such by the regulating authority.

cc File

Cynthia Campbell, Manager, ADEQ Water Quality Compliance Section  
Debra Daniel, ADEQ, Manager, Surface Water Section  
Marnie Greenbie, ADEQ, Supervisor, Permits  
Steve Baker, ADHS, Asst. Bureau Chief of State Laboratory Services